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*Attorneys for Defendants Soar Energy, Inc., Brian Decker,
Cory Decker and Michael Machino*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

WOLVES VENTURES, LLC, a Utah limited liability company, AVEYO DIRECT, LLC, a Utah limited liability company, and INSIGHT CONSULTING, LLC, a Utah limited liability company on behalf of themselves and derivatively on behalf of AVEYO SOARS, LLC, a Utah limited liability company,

Plaintiffs,

v.

SOAR ENERGY, INC., a California corporation, BRIAN DECKER, individually, CORY DECKER, individually, and MICHAEL MACHINO, individually,

Defendants.

**STIPULATION AND JOINT MOTION
FOR EXTENSION OF TIME FOR
DEFENDANTS SOAR ENERGY, INC.,
BRIAN DECKER, AND MICHAEL
MACHINO TO RESPOND TO
PLAINTIFFS' COMPLAINT**

Case No. 2:25-cv-00339-AMA

Judge Ann Marie McLiff Allen

Magistrate Judge Cecilia M. Romero

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants, on the one hand, and Plaintiffs, on the other hand, through their respective counsel of record, hereby stipulate and jointly move the Court to extend the due date through and including June 23, 2025, for Soar Energy, Inc. ("Soar Energy"), Brian Decker ("Brian"), and Michael Machino ("Machino") to file

a response to Plaintiffs' Complaint [Dkt. 1]. As good cause for the requested extension, counsel for the parties have been continuing to discuss the removal and venue for the claims, including arbitration. Accordingly, the Parties respectfully request that the Court enter an order extending the time for Soar Energy, Brian, and Machino to respond to the Complaint through and including June 23, 2025.

A proposed order is attached hereto as **Exhibit A**.

Respectfully submitted this 9th day of June 2025.

PARR BROWN GEE & LOVELESS, P.C.

By: /s/ Kara M. Houck
James L. Ahlstrom
Kara M. Houck
Austin D. Bybee
Attorneys for Defendants

KUNZLER BEAN & ADAMSON

By: /s/ Chad S. Pehrson*
Chad S. Pehrson
Attorneys for Plaintiffs
**Electronically signed with permission
via email*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of June 2025, a true and correct copy of the foregoing STIPULATION AND JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS SOAR ENERGY, INC., BRIAN DECKER, AND MICHAEL MACHINO TO RESPOND TO PLAINTIFFS' COMPLAINT was filed with the Clerk of the Court using the CM/ECT system and sent to the following via email:

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